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Air Pollution Control News from Humboldt - Trinity & Del Norte

Volume 10, No. 1 First Quarter - 1978
5600 South Broadway; Eureka, California 95501 (707) 443-3093

THE TRADEOFF QUESTION: MORE INDUSTRY AND CLEANER AIR?

One of the more intriguing environmental issues these days is something called "air pollutant tradeoffs."

The goal of pollutant tradeoffs sounds like eating your cake and having it: To allow more emissions-prone industry in areas with serious air pollution while actually improving air quality.

The explanation is simple, although the execution is not. Under the tradeoff idea, a new industrial plant can be built or an old one expanded in a locality where air quality standards already are being exceeded--if the company arranges to reduce the pollutants from nearby sources (its own or somebody else's) more than enough to make up for emissions from the new plant.

Pollutant tradeoffs have a handy characteristic: They are one way to improve air quality (up to a point, anyhow) and at the same time allow industry to grow. That kind of compromise, obviously, involves some weighty political as well as economic/social values in California.

Air pollution regulations were one of various issues in the case of the proposed Dow Chemical Company petrochemical complex that was withdrawn from Solano County. Pollutant tradeoffs are a central issue in the case of the proposed SOHIO oil terminal at Long Beach.

As usual in matters of the environment, California has produced its share of ideas and arguments about such tradeoffs. This state also is the first to try for a consistent, statewide policy on the issue. Viewpoints on the question were described in a recent publication from the Institute of Governmental Studies at UC, Berkeley.* This newsletter summarizes that report by Aileen Alfandary, titled "Air Tradeoffs: Attempting to Reconcile Industrial Growth and Clean Air in California."

Background

Three levels of government are involved in air pollution control: (1) local and regional districts, of which there are 47 in the state; (2) the state, through the California Air Resources Board (ARB); and (3) the federal government, through the Environmental Protection Agency (EPA). The goal at all levels is to achieve air quality standards set by the EPA and ARB--although just when, if ever, those objectives will be reached in heavily polluted air basins is a matter of some controversy. (The present deadlines, which

*Public Affairs Report, Vol. 18, No. 5, October, 1977.

have been postponed a couple of times, are in the 1980's.)

One step toward the goal is preparation of a state plan which will indicate, to the EPA's satisfaction, how the job of cleaning up California's air is being carried out. The deadline for adoption of the state plan is in 1979. An important part of the plan--which actually is largely in place, although not yet fully accepted by EPA--is a set of rules that control construction of new factories, refineries, power plants and other stationary sources of air pollution. These rules are known as "new source review." New source review is where air pollutant tradeoffs come in.

Issues under debate

The rules governing air pollutant tradeoffs involve compromise, hence controversy. EPA regulations require that each tradeoff must somehow result, on balance, in improved air quality. Beyond that, there's room for discussion. Proposed statewide regulations for tradeoffs in California are under debate in the form of Assembly Bill 471 (Calvo). There isn't space here to explore all of the suggested answers, but here are some of the questions:

--How much more pollution than the new plant will emit must be cleaned up in existing sources?

--Should the amount of pollution to be traded off be calculated on the existing plant's actual or allowable emissions? A "clean" plant may be putting out a good deal less pollution than the law allows.

--What size plant must comply with tradeoff requirements? It's generally agreed that most small businesses should be exempt.

--How far away can operators of the new facility go to obtain tradeoffs? The strict environmentalist viewpoint is that air quality should be improved in the neighborhood of the new plant. Another proposal is that somewhat dirtier air be allowed at that location, as long as an offsetting improvement in air quality takes place elsewhere in the air basin.

--How broadly should air pollution associated with a new source be defined? For example, should tradeoffs be arranged not only for direct emissions from the new facility but also for the added emissions from the power plants that supply it? This is a central issue in the SOHIO case at Long Beach.

--Should a voluntary reduction in air pollution below the required level be usable later on by the same operator as a "credit" for pollution? This is called "banking." One argument is that if banking is not allowed, operators will be less likely to make such extra improvements.

The banking question illustrates some of the pressures and political complexities in federal-state air pollution control. According to federal law, a state's air pollution regulations may be stricter than the EPA's, but not weaker. Although they are being revised, EPA rules presently do not permit banking, so at the moment it would appear that banking is out of the question in this state. However, if California--whose air pollution regulations are famed as the nation's toughest--comes down on the side of banking, EPA might lose some political support for its strict stand. Hence, says author Alfandary, "either California or the EPA will have to back down on this issue."

The concept of a statewide air pollutant tradeoff policy leads to some other intriguing questions:

Might existing sources in a region refuse to arrange tradeoffs with new enterprises, as a way of stifling competition?

Might an existing source sell its pollutant tradeoff potential to the highest bidder? The idea of a market price on the "right to pollute" may offend some people; but as more tradeoffs are arranged, the economic value of that right almost certainly will grow.

Payoff: Better technology

One possible benefit of tradeoffs is better air pollution control methods. This is because (1) tradeoff credit is available only for reductions in emissions below the level required by existing regulations; (2) most existing regulations already require use of the "best available control technology"; (3) so, to get the benefits of tradeoffs, there's a continuing incentive to develop even better devices and methods.

In any case, it's important to keep in mind that pollutant tradeoffs depend largely on control technology--that is, devices that reduce emissions but rarely if ever eliminate them.

This means that gains in air quality from pollutant tradeoffs in industry, like the gains from smog control devices on motor vehicles, may be over-balanced sooner or later by growth--more industry, more people, more emission sources. If that happens, Californians probably will have to choose between even worse air pollution and some fundamental changes in their economy and/or lifestyle.

NOTE: This article was reprinted from the University of California Cooperative Extension publication entitled California's Environment.

AIR POLLUTION VIOLATIONS

Eleven violation notices were issued in Humboldt, Del Norte and Trinity Counties during the first quarter of 1978, mostly for tepee burners experiencing operating difficulties during periods of heavy rain.

DATE	LOCATION	SOURCE	VIOLATION
01/17/78	St. Joseph Hosp.-Eureka	Incinerator	Visual Emissions
01/17/78	Eel River Sawmill-Rio Dell	Tepee Burner	Visual Emissions
01/19/78	Cal-Pacific - Orick	Tepee Burner	Visual Emissions
01/19/78	Westbrook Wd. Prod.-Cres. City	Tepee Burner	Visual Emissions
01/19/78	Arcata Redwood Co. - Orick	Tepee Burner	Visual Emissions
01/19/78	Simpson Timber Co. - Klamath	Tepee Burner	Visual Emissions
01/26/78	SWF Plywood - Burnt Ranch	Tepee Burner	Visual Emissions
01/26/78	McIntosh Lumber - Blue Lake	Tepee Burner	Visual Emissions
01/26/78	Hyampom Lbr. Co. - Hyampom	Tepee Burner	Visual Emissions
3/22/78	Willow Creek Inc.-Willow Creek	Tepee Burner	Visual Emissions
3/22/78	McIntosh Lbr. Co. - Blue Lake	Tepee Burner	Visual Emissions

COUNCIL ADOPTS BREAKDOWN RULE

At its April 20, 1978, meeting held in Guerneville, California, the Control Council of the North Coast Air Basin adopted new breakdown and emergency variance rules patterned after the ARB model rule. These new rules include the necessary additional features required to obtain EPA approval. The prior breakdown rule had been disapproved by EPA in January, 1978. Under the new rules, breakdown exemptions are limited to 24 hours, after which an emergency variance must be issued by a Hearing Board member. Added reporting requirements are incorporated in the new rules. The Council also approved the nonattainment plans for Humboldt and Mendocino Counties. A resolution supporting the appointment of John Caton, Siskiyou County Supervisor, to the ARB was forwarded to Governor Brown by the Council.

COMPLAINT SUMMARY

Pulp mill odor complaints, which had been at record low levels during the past five months, increased in March because of breakdowns in mill odor control systems.

	January	February	March
Pulp Mill Odor	3	1	11
Smoke	6	2	9
Fallout	2	0	2
Miscellaneous	2	2	6

PARTICLEBOARD PLANT VARIANCE GRANTED

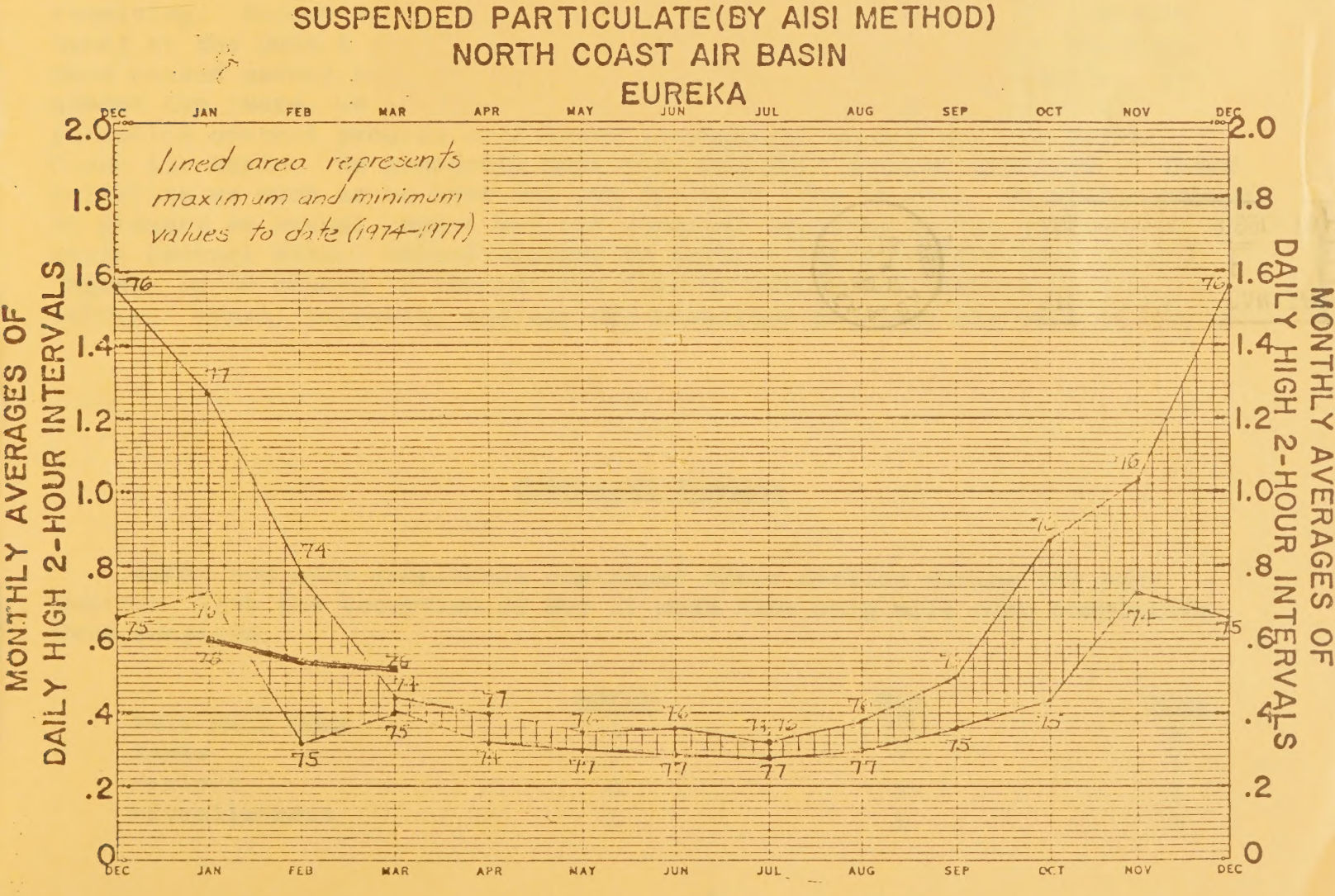
The Hearing Board of the Humboldt County Air Pollution Control District met on April 13, 1978, to consider the application of the Louisiana-Pacific Corporation for a variance from the particulate emission limitations of Rule 420(d) for their Arcata particleboard plant. The variance request was caused by the denial of seven operating permit applications by the Humboldt County Air Pollution Control District because of excessive particulate emissions from dust collection systems at the Arcata plant. After a lengthy discussion and analysis of the plant operation by the Hearing Board, a variance was granted covering a series of plant modifications which will be completed by October, 1978.

SUSPENDED PARTICULATE MATTER

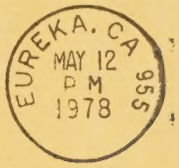
(Micrograms per Cubic Meter)*

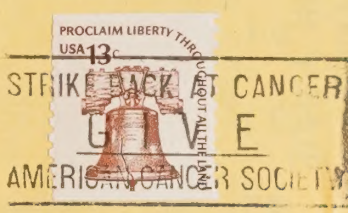
COUNTY	HUMBOLDT					DEL NORTE	TRINITY
DATE	EUREKA HEALTH	EUREKA CALTRANS	EUREKA WELFARE	SPRUCE POINT	ARCATA	CRESCENT CITY	WEAVERVILLE
JAN. 2	18	13	14	9	15	-	32
8	18	12	13	13	17		
14	14	-	12	10	15	67	-
20	58	56	56	39	57		
26	99	-	107	68	81	60	85
FEB. 1	38	33	38	20	35		
7	50	44	42	34	28	-	44
13	44	40	41	24	41		
19	35	38	38	38	26	-	33
25	-	39	40	21	33		
MAR. 3	18	16	20	15	28	41	22
9	76	77	81	63	60		
15	69	76	97	46	63	55	67
21	71	78	94	51	56		
27	35	34	-	28	37	33	27

*The California maximum allowable value is 100 micrograms per cubic meter for a 24-hour sample.


SUSPENDED PARTICULATE(BY AISI METHOD)
NORTH COAST AIR BASIN
EUREKA
lined area represents maximum and minimum values to date (1974-1977)
MONTHLY AVERAGES OF DAILY HIGH 2-HOUR INTERVALS
DEC JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC
2.0 1.8 1.6 1.4 1.2 1.0 .8 .6 .4 .2 0

YEAR OF 1978





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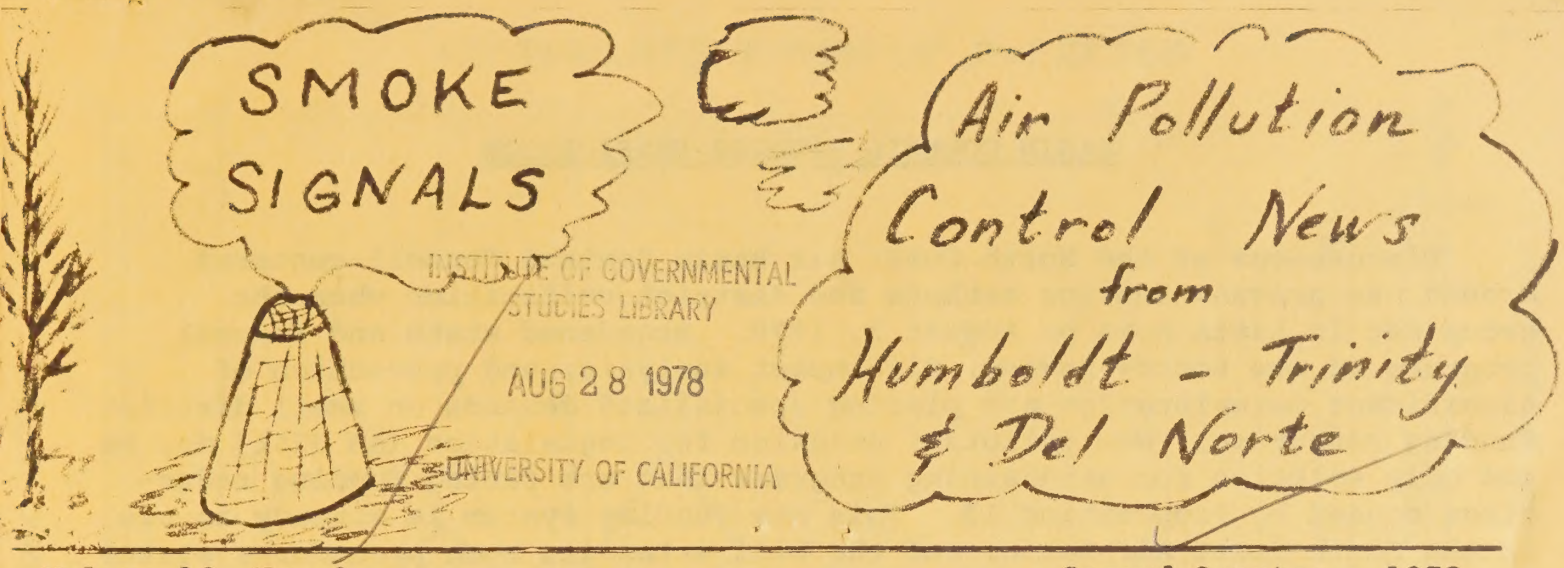

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FAREWELL FROM SMOKE SIGNALS

This will be the final issue of Smoke Signals which you will be receiving. Budget cutbacks caused by passage of Proposition 13 (Jarvis-Gann) at the June 6 election and increased printing and postage expenses have caused severe reductions in our services and supplies accounts. For almost ten years, we have had the pleasure of reporting to you on air pollution control program activities in Humboldt County and the North Coast Air Basin. We sincerely hope that you have enjoyed portions of these bulletins as much as we have enjoyed bringing them to you. We will continue to prepare an annual report and our biennial updating of the North Coast Air Basin Control Plan. Anyone wishing to receive these publications should request to be placed on the mailing list by calling or writing to our office. Again, farewell, and may the blessings of clean air be with you.

COMPLAINT SUMMARY

Smoke and odor complaints continued their decline during the past quarter, with the exception of May 31 when nine pulp mill odor complaints were received.

	April	May	June
Pulp Mill Odor	1	15	6
Smoke	2	7	5
Fallout	0	2	1
Miscellaneous	1	2	2

BASIN COUNCIL STUDIES UNIFICATION

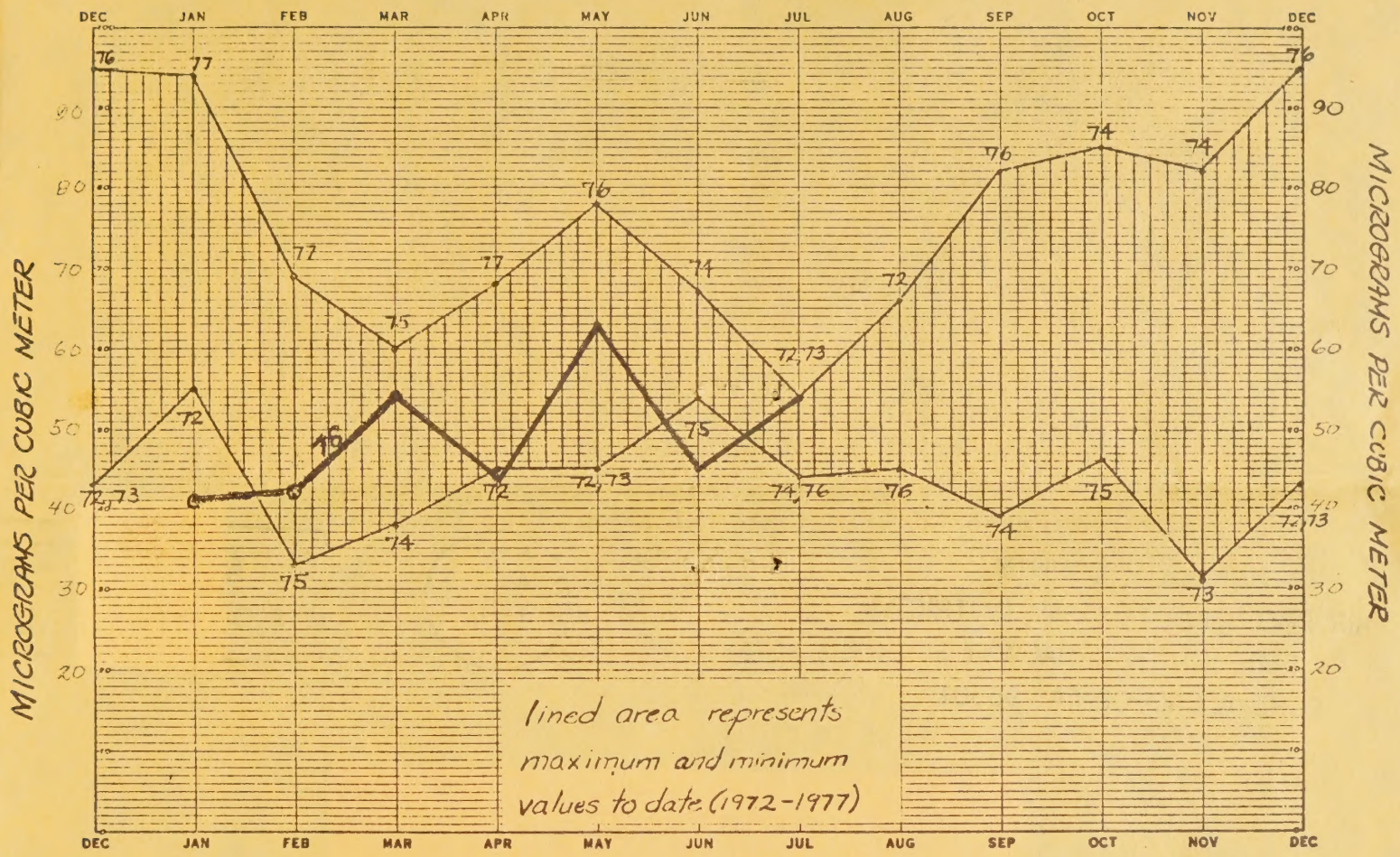
Discussions of the North Coast Air Basin Control Council centered around new program funding methods and district unification when the group met in Santa Rosa on August 3, 1978. Broadened state and federal programs of new source review, air impact analysis, and prevention of significant deterioration are placing specialized demands on small district funding resources. New pollutant emission fee legislation (AB 3251) may be the only solution for maintaining programs that are facing funding reductions caused by Proposition 13. This new funding system is already in use in the South Coast Air Basin, and the bill extending such procedures statewide is awaiting action in the State Senate. The proposal would apply only to large emission sources of greater than 25 tons per year of pollutant emissions. The concept of unification which had been considered previouly in 1974 is becoming more attractive as a means of securing added state subvention funding for small rural north coast counties. Studies of the possible benefits of a unified district are being made for future Council review. The next meeting will be held in early October and some more definite actions may be taken at that time.

AIR POLLUTION VIOLATIONS

Only seven violation notices were issued during the second quarter of 1978 as tepee burner operations improved with the return of dry summer weather.

DATE	LOCATION	SOURCE	VIOLATION
4/18/78	Burl Country - Fortuna	Open Fires	Open Burning-Reg. 2
4/20/78	Simpson Timber-Klamath	Tepee Burner	Visual Emissions
4/20/78	Arcata Redwood - Orick	Tepee Burner	Visual Emissions
5/01/78	City of Arcata	Open Fires	Open Burning-Reg. 2
5/02/78	Louisiana-Pacific - Samoa	Recovery Furnace	Visual Emissions
6/08/78	Arcata Redwood - Orick	Tepee Burner	Visual Emissions
6/14/78	Cal-Pacific - Orick	Tepee Burner	Visual Emissions

PARTICULATE MONTHLY AVERAGES


DEC JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC
MICROGRAMS PER CUBIC METER
90 80 70 60 50 40 30 20
lined area represents maximum and minimum values to date (1972-1977)

YEAR OF 19 78

@ EUREKA - COUNTY HEALTH DEPT.

SUSPENDED PARTICULATE MATTER

(Micrograms per Cubic Meter)*

COUNTY	HUMBOLDT					DEL NORTE	TRINITY
DATE	EUREKA HEALTH	EUREKA CALTRANS	EUREKA WELFARE	SPRUCE POINT	ARCATA	CRESCENT CITY	WEAVERVILLE
April 2	33	28	-	18	21		
8	75	70	-	63	43	46	-
14	35	32	-	22	31		
20	31	21	37	12	23	22	16
26	47	48	69	31	33		
May 2	86	88	94	69	74	58	24
8	64	82	99	62	61		
14	32	28	43	21	22	31	14
20	80	66	96	41	54		
26	54	45	82	30	42	46	-
June 1	63	68	75	65	55		
7	36	53	65	32	35	26	27
13	41	52	68	35	39		
19	-	77	81	68	49	-	28
25	39	38	57	31	28		

*The California maximum allowable value is 100 micrograms per cubic meter for a 24-hour sample.

HUMBOLDT COUNTY
AIR POLLUTION CONTROL DISTRICT
5600 SOUTH BROADWAY
EUREKA, CALIFORNIA 95501

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1978

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